

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Civil Action No. 02-2917 (JEI)

Allen Press, Esquire
Green Jacobson & Butsch, P.C.
7733 Forsyth Boulevard
Suite 700
St. Louis, MO 63105

PLEASE TAKE NOTICE that on Tuesday, September 6, 2011, at 9:30 a.m. or as soon thereafter as counsel may be heard, the undersigned counsel for Defendant, the Air Line Pilots Association International, shall move before the United States District Court for the District of New Jersey, at the U. S. Courthouse and Post Office Building in Camden, New Jersey, for an Order granting a new trial pursuant to Fed. R. Civ. P. 59 in the event that the Court does not grant ALPA's motion, being filed concurrently, for judgment as a matter of law, notwithstanding the jury's liability verdict, pursuant to Fed. R. Civ. P. 50(b).

In support of this motion, the undersigned shall rely upon the brief being submitted with this Notice of Motion, the accompanying Declaration of Counsel and the record herein. A proposed form of Order is also being submitted.

Oral argument is requested.

Respectfully submitted,

ARCHER & GREINER
A Professional Corporation

By: /s/ Steven J. Fram
STEVEN J. FRAM, ESQUIRE

Pro Hac Vice:

Daniel M. Katz, Esquire
Katz & Ranzman, P.C.
1015 18th Street, N.W., Suite 801
Washington, DC 20036
(202) 659-4656
Counsel for Defendant, Air Line Pilots Association

Dated: August 10, 2011.

7010549v1